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January 14, 2021

FILED VIA ECF

Honorable Denise L. Cote  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Zalmund Zirkind*, S8 19 Cr. 463 (DLC)  
***Application for Leave to Permit Defense Counsel to Enter the Courthouse with  
Computers***  
Sentencing: January 15, 2021

Dear Judge Cote:

This letter is respectfully written to request the opportunity for both defense counsel, Neil M. Schuster and Johanna Zapp, to enter the Courthouse with computers in order to have a backup system to present a video that addresses sentencing related issues. Counsel has confronted certain problems and has been unable to overcome those issues with presenting this video in advance to the Court.

Respectfully submitted,

*s/Neil M. Schuster*  
Neil M. Schuster

NMS:asnd  
cc: All parties by ECF